

## SUMMARY OF THE REJECTIONS

Claims 1, 3-16, 22, 24-37, 43, and 45-58 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Elgamal et al. (U.S. Patent No. 6,389,534) (“Elgamal”) in view of Guheen et al. (U.S. Patent No. 6,615,166) (“Guheen”).

Claims 17-21, 38-42 and 59-63 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Elgamal in view of Guheen and Schell et al. (U.S. Patent No. 5,933,503) (“Schell”).

Claims 64-66 are rejected under 35 U.S.C. §103(a) as being unpatentable over Elgamal in view of Guheen and Fieres et al. (U.S. Patent No. 6,148,083) (“Fieres”).

### *Claims 1, 3-16, 22, 24-37, 43, and 45-58*

The Office Action rejected Claims 1, 3-16, 22, 24-37, 43, and 45-58 under 35 U.S.C. §103(a) as allegedly being unpatentable over Elgamal in view of Guheen. The rejection is traversed, respectfully.

With regard to Claim 1, there is recited a method performed by a framework in a system comprising the framework and at least one application; that method comprising:

receiving a request from the application for a customized implementation of a service;

determining a set of zero or more restrictions to be imposed upon said customized implementation;

dynamically constructing said customized implementation, said customized implementation incorporating said restrictions, and comprising enforcement logic for enforcing said restrictions; and

providing said customized implementation to the application;

**wherein said customized implementation is invocable by the application without further interaction with the framework.**

(emphasis added).

The method of Claim 1 is quite advantageous because it allows an application to obtain access to services without repeatedly requesting those services from some centralized framework.

Specifically, when an application needs to access a particular service, it makes a request to a centralized framework for a customized implementation of that service. In response, the centralized framework dynamically constructs the customized implementation. The customized implementation includes enforcement logic for enforcing certain restrictions on the service. The centralized framework then provides the customized implementation to the requesting application. It is an invocable implementation of the service that is returned to the application rather than a result of an operation. Because this is the case, the application can, in the future, obtain the service by invoking the customized implementation directly. The application does not need to interact with the framework again to obtain the service. By removing the framework from the service request/provision process, the method of claim 1 removes the centralized framework as a potential performance bottleneck. This and other benefits can be derived from the method of Claim 1.

The Office Action concedes that Elgamal does not teach or suggest a customized implementation that is invocable by an application without further interaction with a framework. The Office Action relies solely on Guheen to disclose, allegedly, this feature of Claim 1.

Specifically, the Office Action alleges that col. 43, lines 54-67 of Guheen disclose this feature of Claim 1. This section says:

Data elements should therefore be locked at least by the time construction starts, and possibly earlier, depending on the discipline of the team. Project members must be allowed to browse the data elements, but only the Repository Management team should be allowed to modify or unlock data elements. In some repositories, it is difficult to restrict the creation of repository objects. If this is the case, it may be acceptable to let designers create data elements if these are

reviewed and locked at the end of each day. Increased control can be obtained by having designers submit requests for new data elements to the repository administrator. This allows the repository manager to evaluate whether the new data element is justified, or whether an existing one should be used.

This section of Guheen says nothing about a customized implementation, an application, or a framework. This section of Guheen says absolutely nothing about a customized implementation that is invocable by an application without further interaction with a framework. It is not even remotely apparent how this section of Guheen is supposed to disclose “a customized implementation that is invocable by an application without further interaction with a framework.” If the rejection is maintained on the same grounds, then an explanation of how this section of Guheen is supposed to disclose “a customized implementation that is invocable by an application without further interaction with a framework,” rather than a bare assertion that it does so, is respectfully requested.

Neither Elgamal nor Guheen discloses, teaches, or suggests the limitation “wherein said customized implementation is invocable by the application without further interaction with the framework” as contained in Claim 1. Therefore, even assuming, *arguendo*, that it would have been obvious to combine Elgamal and Guheen, the combination of Elgamal and Guheen still fails to teach or suggest this limitation. Accordingly, Claim 1 is patentable over Elgamal and Guheen, taken individually or in combination.

Claims 3-16 depend from Claim 1 and therefore comprise the limitations of Claim 1 that are distinguished from Elgamal and Guheen. Accordingly, Claims 3-16 are patentable over Elgamal and Guheen, taken individually or in combination.

Claims 22 and 24-37 are framework claims analogous to the methods of Claims 1 and 3-16, respectively. Claims 43 and 45-58 are computer-readable medium claims analogous to the

methods of Claims 1 and 3-16, respectively. Therefore, Claims 22, 24-37, 43, and 45-58 are patentable over Elgamal and Guheen, taken individually or in combination.

*Claims 17-21, 38-42 and 59-63*

The Office Action rejected Claims 17-21, 38-42 and 59-63 under 35 U.S.C. §103(a) as allegedly being unpatentable over Elgamal in view of Guheen and Schell. The rejection is traversed, respectfully.

Claims 17-21 depend from Claim 1 and therefore comprise the limitations of Claim 1 that are distinguished from Elgamal and Guheen. The Office Action does not even allege that Schell teaches or suggests these distinguished limitations.

Accordingly, Claims 17-21 are patentable over Elgamal, Guheen, and Schell, taken individually or in combination.

Claims 38-42 are framework claims analogous to the methods of Claims 17-21, respectively. Claims 59-63 are computer-readable medium claims analogous to the methods of Claims 17-21, respectively. Therefore, Claims 38-42 and 59-63 are patentable over Elgamal, Guheen, and Schell, taken individually or in combination.

*Claims 64-66*

The Office Action rejected Claims 64-66 under 35 U.S.C. §103(a) as allegedly being unpatentable over Elgamal in view of Guheen and Fieres. The rejection is traversed, respectfully.

Claim 64 depends from Claim 1 and therefore comprises the limitations of Claim 1 that are distinguished from Elgamal and Guheen. The Office Action does not even allege that Fieres teaches or suggests these distinguished limitations.

Accordingly, Claim 64 is patentable over Elgamal, Guheen, and Fieres, taken individually or in combination.

Claim 65 is a framework claim analogous to the method of Claim 64. Claim 66 is a computer-readable medium claim analogous to the method of Claim 64. Therefore, Claims 65 and 66 are patentable over Elgamal, Guheen, and Fieres, taken individually or in combination.

### CONCLUSION

For at least the reasons set forth above, Applicants respectfully submit that all pending claims are patentable over the art of record, including the art cited but not applied. Accordingly, allowance of all claims is hereby respectfully solicited.

Respectfully submitted,

HICKMAN PALERMO TRUONG & BECKER LLP



Christian A. Nicholes  
Registration No. 50,266

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2055 Gateway Place  
San Jose, California 95110-1019  
Tel: (408) 414-1224  
Fax: (408) 414-1076

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by

  
Judy Paradowski